

1 STEPHANIE S. CHRISTENSEN
2 Acting United States Attorney
3 SCOTT M. GARRINGER
4 Assistant United States Attorney
5 Chief, Criminal Division
6 JOHN J. LULEJIAN (Cal. Bar No. 186783)
7 Assistant United States Attorney
1200 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-0721
Facsimile: (213) 894-0142
E-mail: john.lulejian@usdoj.gov

8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. 2:87-cr-00422-JAK

13 Plaintiff,

UNITED STATES' EX PARTE

14 v.

APPLICATION TO UNSEAL DOCUMENTS;
DECLARATION OF JOHN J. LULEJIAN;
[Proposed] ORDER

15 RAFAEL CARO-QUINTERO,

16 Defendant.

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1 Plaintiff United States of America, by and through its counsel
2 of record, the Acting United States Attorney for the Central District
3 of California and Assistant United States Attorney John J. Lulejian,
4 hereby files its Ex Parte Application to Unseal Documents.

5 This ex parte application is based upon the attached Declaration
6 of John J. Lulejian.

7 Dated: July 26, 2022

Respectfully submitted,

8 STEPHANIE S. CHRISTENSEN
9 Acting United States Attorney

10 SCOTT M. GARRINGER
11 Assistant United States Attorney
Chief, Criminal Division

12 /s/ John J. Lulejian

13 JOHN J. LULEJIAN
Assistant United States Attorneys

14 Attorneys for Plaintiff
15 UNITED STATES OF AMERICA

DECLARATION OF JOHN J. LULEJIAN

I, John J. Lulejian, declare as follows:

1. I am an Assistant United States Attorney and am one of the attorneys representing the United States in United States v. Rafael Caro-Quintero, Case No. 2:87-cv-00422-JAK. I make this declaration in support of the United States' Ex Parte Application to Unseal Documents.

2. On July 25, 2022, this Court granted the United States' ex parte application to unseal the May 13, 1987 warrant for the arrest of defendant RAFAEL CARO-QUINTERO (Docket No. 2518) in the above-captioned case. (See Docket No. 4473.)

3. On July 30, 1992, a grand jury in Los Angeles, California, returned the Seventh Superseding Indictment in the above-captioned case. Although the Seventh Superseding Indictment (Docket No. 1646) was used at the 1992 trial of co-defendants Ruben Zuno-Arce and Humberto Alveraz-Machain, the United States cannot find a written Order that unseals that charging instrument.

4. In addition, the United States has learned that on that same day the grand jury returned the Seventh Superseding Indictment, the Honorable Rupert J. Groh Jr., United States Magistrate Judge for the Central District of California, issued a bench warrant for defendant RAFAEL CARO-QUINTERO (Docket No. 2520). That bench warrant remains under seal.

5. I am informed and believe that on or about July 15, 2022, Mexican authorities arrested RAFAEL CARO-QUINTERO in Sinaloa, Mexico, and that he is currently in custody in a Mexican prison.

6. The United States intends to extradite defendant RAFAEL CARO-OUINTERO to stand trial in this District on the charges alleged

1 in the Seventh Superseding Indictment. Therefore, the United States
2 respectfully requests that the Court unseal the Seventh Superseding
3 Indictment (Docket No. 1646) and defendant RAFAEL CARO-QUINTERO's
4 1992 bench warrant (Docket No. 2520) so that the United States may
5 provide those documents Mexico as part of its request for
6 extradition.

7 7. Further, because defendant RAFAEL CARO-QUINTERO is in
8 custody, there no longer is a reason for this document to remain
9 under seal.

10 I declare under penalty of perjury that the foregoing is true
11 and correct to the best of my knowledge.
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13 Executed this 26th day of July, 2022, at Los Angeles,
14 California.

15 */s/ John J. Lulejian*
16 JOHN J. LULEJIAN
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